

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

Ray E. Hoffman and Patricia L. Hoffman, husband and wife,)	Case No.: 2:17-cv-01062-JLR
)	
<i>Plaintiffs,</i>)	[Removal from Superior Court for the State of
)	Washington, County of Whatcom, Case No. 17-2-
vs.)	01094-1]
)	
PennyMac Holdings LLC, Homecomings)	STIPULATION FOR CHANGE OF TRIAL DATE
Financial Network, Inc. and all other persons)	
or entities unknown claiming any right, title, or)	
interest in the property described in Complaint,))	
<i>Defendants.</i>)	
)	
)	
)	

Counsel for Plaintiff and counsel for Defendant stipulate and jointly move for the continuance and resetting of the trial date in this matter which is presently set for January 22, 2019.

AS GROUNDS for the requested continuance and resetting of the trial date, the parties state and show the court the following:

1. On December 27, 2018 the court issued a Notice of Likely Change in the Trial Date from January 22, 2018 to January 14, 2018. Docket No. 37. The Docket Text states the court will confirm the change of trial date on January 8, 2019.

1 2. Counsel for Plaintiff learned of the proposed change in the trial date on December 28,
2 2018. Immediately upon learning of the proposed change he called the court's Case
3 Administrator and left a message advising he is not available the week of January 14, 2019 as he
4 had hearings on the 14th and the 16th. He further advised the parties were in settlement
5 discussions and the parties' respective counsel agreed to hold off on the depositions in hopes of
6 getting the matter settled. Several months ago counsel for the parties agreed to hold off on
7 conducting depositions in the hope of getting the matter settled. On, or about, December 21,
8 2018 the parties' respective counsel agreed if the case does not settle they would complete
9 depositions before the scheduled January 22, 2018.
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12 3. On December 28, 2018 the court's Case Administrator returned the call of Plaintiff's
13 counsel and left a message advising he should file a motion seeking relief from the proposed
14 change in trial date. After returning to his office Plaintiff's counsel telephoned Defendant's
15 California counsel Pavel Ekmekchyan and local counsel Donald Grant but had to leave a
16 message.
17

18 4. Counsel for the respective parties discussed the matter by telephone on December 31,
19 2018. Defendant's California counsel Pavel Ekmekchyan advised he could not rearrange his
20 schedule to appear for a trial beginning January 14, 2019. Defendant's local counsel Donald
21 Grant also advised that he could not rearrange his schedule to appear for trial beginning January
22 14, 2019.
23

24 5. Plaintiff's counsel and Defendant's California counsel Pavel Ekmekchyan are in
25 earnest settlement discussions and are very hopeful they can get this matter settled short of trial.
26

27 6. No other continuances have been sought or granted.
28

1 7. The parties agree and acknowledge that no one will be prejudiced by a change of trial
2 date.

3 WHEREFORE the parties stipulate to and request the court's approval of a continuance
4 of the January 22, 2019 trial date in this matter and request that the parties be permitted to reset
5 the trial on appropriate notice.
6

7 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

8 *Date: 01/02/2019* /s/ Steven C. Hathaway
9 Steven C. Hathaway, WSBA # 24971
10 Attorney for Plaintiffs
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13 *Date: 01/02/2019* /s/ Donald G. Grant
14 Donald G. Grant, P.S.
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19 *Date: 01/02/2019* /s/ Pavel Ekmekchyan
20 Pavel Ekmekchyan
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24 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

25 *Date: _____* UNITED STATES DISTRICT JUDGE
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